

Mark Ahlemeyer, OSB No. 095997
Assistant Federal Public Defender
Email: mark_ahlemeyer@fd.org
101 SW Main Street, Suite 1700
Portland, OR 97204
Tel: (503) 326-2123
Fax: (503) 326-5524

Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HAWAZEN SAMEER MOTHAFAR,

Defendant.

Case No.: 3:20-cr-00506-HZ

**DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED MOTION
TO CONTINUE TRIAL DATE**

I, Mark Ahlemeyer, declare:

1. I am the attorney appointed to represent Hawazen Sameer Mothafar in the above-entitled case.
2. A jury trial in this case is currently scheduled for October 4, 2022. Mr. Mothafar was arraigned on November 5, 2020. One continuance was sought by the defense prior to the designation of the case as complex. The current trial date was set pursuant to a briefing schedule the parties proposed as part of the complex case designation.

3. The defense is working with the government to process and receive discovery. The defense is conducting investigation in this case, including obtaining information relating to circumstances of the offense and Mr. Mothafar's background. This information relates to pretrial litigation, trial, and sentencing. The parties also continue to explore the possibility of the case resolving short of trial. Mr. Mothafar therefore respectfully requests that this Court continue his case for a period of approximately 90 days or more to accomplish these tasks.

4. I have discussed with Mr. Mothafar his right to a speedy trial. He agrees to the continuance and knows it will result in excludable delay under the provisions of 18 U.S.C. § 3161(h)(7)(A) of the Speedy Trial Act.

5. Assistant United States Attorney Ethan Knight has no objection to this motion.

6. I make this motion in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on August 24, 2022, in Portland, Oregon.

/s/ Mark Ahlemeyer

Mark Ahlemeyer
Attorney for Defendant